

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KASHMAN HARRIS	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
v.	:	No. 21-1636-JMG
	:	
SKIPPACK EMERGENCY MEDICAL	:	
SERVICES, INC.	:	
	:	
Defendant.	:	
	:	

**STIPULATION TO PERMIT PLAINTIFF TO FILE A
SECOND AMENDED COMPLAINT PURSUANT TO FED R.CIV.P. 15
AND TO AMEND CAPTION**

The Parties in the above-captioned matter hereby stipulate as follows:

1. Plaintiff is permitted to file a Second Amended Complaint in the form attached hereto, and that the Second Amended Complaint shall be deemed filed as of the date the Second Amended Complaint is filed following Court approval of this Stipulation;
2. Defendant reserves all rights with respect to the merits of the claims set forth in Plaintiff's Second Amended Complaint and nothing herein shall be construed as a waiver of any defenses or arguments with respect thereto by Defendant, including but not limited to jurisdiction, statute of limitations, and failure to exhaust administrative remedies;
3. Defendant shall have thirty (30) days from the date Plaintiff's Second Amended Complaint is filed to file an Answer or otherwise move in response to Plaintiff's Second Amended Complaint.

4. The new caption of this action shall be as follows:

KASHMAN HARRIS :
Plaintiff, :
v. :
: :
SEMS, INC. t/a :
Skippack Emergency :
Medical Services, Inc. :
Defendant. :

No. 21-1636

/s/ Adam C. Lease

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BY THE COURT:

/s/ John M. Gallagher

John M. Gallagher
United States District Court Judge

Dated: 08/26/2021